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By E-MAIL to planningpolicyteam.bc@buckinghamshire.gov.uk

18th March 2021

Dear Sirs,

Response to Consultation on Statement of Community Involvement

We are responding by e-mail rather than using the on-line form, as it is not at all easy to align the on-line tick box responses with the many statements set out in your document.

Please see our comments below, following the same numbering as on your on-line response form:

1&2

You say “as a minimum we will comply with any legislation” – well that is a given requirement anyway. What you should do, is to add what you say you MAY do, to what you say you WILL do, in all sections of this consultation, notwithstanding any change in the minimum required by legislation. If this is not done, this document will be highly undemocratic and result in a less visible and less inclusive planning system. The community would be inhibited from being involved. The Statement would fail in its aim.

You say “we will tailor our approach where needed” but then don’t say how you will “tailor” your approach. On what bases will you decide when and how to tailor your approach?

You say you will “provide opportunities” for communities to put their ideas forward but in the succeeding sections you then limit those opportunities to too little, too late and make them invisible. In many cases, the public wouldn’t even have been made aware of any “opportunity” arising in order to comment on it, if your “will do” list of actions remains so restricted.

You say you will be “transparent” but this document removes transparency, for example by not sending out neighbour notification letters, not using lamppost/site notices, not publishing a draft Local Plan for consultation. You say you “may” do these things – we say you MUST take these actions.

Your proposals do not make the planning system more accessible, they make the system less accessible and less inclusive.

You should always (not only where you think “where appropriate”) provide “clear feedback to participants” after engagement exercises. The public conception is that public responses to these consultation exercises just disappear into a black hole and are ignored. You should make public your summary of responses which you give to the Cabinet member.



You say you want residents to be “at the heart of what we do” – but then the SCI removes their voice by removing methods of notification of planning applications and by potentially removing the draft Local Plan consultation stage.

The planning system should not become just a digital service. This disenfranchises many and would not be visible enough because of your limited “WILL DO” lists (many essential actions are on your “MAY DO” lists). How would the public find out about planning applications in their town or neighbourhood unless they constantly search online, on the off-chance they might find an application which affects them? This is simply not realistic.

3, 4 and 5 We strongly disagree that you only “may” (meaning you may not), as opposed to WILL, publish a draft Local Plan for consultation – this is an essential action which you must take to truly involve the community in the Local Plan process. All the items you state you “MAY” do, should be moved into your “WILL DO” list – this comment applies to all sections throughout your SCI.

It is insufficient merely to publish the Publication Plan; a draft Plan must be provided for consultation at a far earlier stage. Paper copies must also be made available at libraries and workshops for communities and town councils must be held.

6, 7 & 8 Strongly disagree because your “WILL” list must include the actions in your “MAY” list. In relation to SPDs, you must invite views from the general public and screen the SPD under the HRA or SEA legislation.

9, 10 & 11 You say you “may amend the boundary of the neighbourhood area if it is inappropriate” but do not say on what basis you could deem it inappropriate nor set out a method for parishes to challenge this. Your WILL list should include your MAY list.

12, 13 & 14 Once a planning application is submitted, you MUST notify town and parish councils, not merely those with a made neighbourhood plan. You MUST display a planning notice near the application site. You MUST send neighbour notification letters. You MUST publish a press notice, you MUST notify town/parish councils, you MUST consult with Natural England, Environment Agency and all relevant consultees, you MUST publicise a weekly list via public channels (and not just digitally). During determination process, you MUST publish documents on your website AT LEAST 14 days before determination date. Your MAY do list should be added to your WILL do list.

15 & 16 Blank

17, 18 & 19 We are very likely to get involved in the planning process in the future.



THE BEACONSFIELD SOCIETY

20 The SCI is one of the most undemocratic documents we have seen. It inhibits the public from getting involved in the planning process and it inhibits visibility of planning applications, Local Plans and SPDs. Please act on these comments.

21 & 22 blank

Yours faithfully,

Alison Wheelhouse
Chairman
The Beaconsfield Society

PREPARED BY THE BEACONSFIELD SOCIETY